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negligence of another. *Held*, that the damages were not restricted to the loss of benefits to which the plaintiff had a legal right, but that it was proper for the jury to consider what reasonable expectations the plaintiffs had of pecuniary benefits to be received from the minor after reaching majority.

DIVORCE—ACTION IN FOREIGN JURISDICTION—INJUNCTION—KEMPSON V. KEMPSON, 43 Atl. Rep. 97 (N. J.).—Bill by plaintiff against the defendant to restrain him from prosecuting an action for divorce. *Held*, where a complaint by a wife alleging that her husband, whose residence was in New Jersey, had gone to North Dakota, and after a pretended residence there for a few months, commenced a suit against her for divorce, presents a case so inequitable as justifies a court of equity in the former state restraining its prosecution.

DIVORCE—FOREIGN ACTION FOR ALIMONY AFTER DECREE—ADAMS V. ABBOTT, 56 Pac. Rep. 931 (Wash.).—Action by Josephine Adams, who had obtained a decree of divorce in a foreign state on constructive service, and without personal jurisdiction of defendant, against Howard Abbott for alimony, and to have certain real property adjudged to plaintiff. *Held*, if the divorce is *ex parte*, a decree for alimony may be subsequently rendered on the wife's application to the courts of her husband's jurisdiction, or those of her own if he can be found there and personally served.

INSOLVENT CORPORATIONS—RIGHT TO PREFER OFFICERS—CAREY V. WADSWORTH ET AL., 25 S. Rep. 503 (Ala.).—A transfer of property by an insolvent corporation to one of its officers in payment of a bona fide debt is valid, although the officer preferred controlled the meeting at which the transfer was authorized.

INTOXICATING LIQUORS—BILL OF LADING—NUISANCE—STATE V. SNYDER, 78 N. W. (Ia.) 807.—A banker sells bills of lading at his bank, thereby enabling the purchasers of such bills to obtain intoxicating liquors at a freight depot. The banker owned neither the bank building nor the liquors. *Held*, that he was guilty of maintaining a nuisance defined as using a building in which intoxicating liquors are sold unlawfully.

INTOXICATING LIQUORS—LICENSE—IN RE WURHOLTZ, 43 Atl. Rep. 75 (Penn.).—Where a party who applies for a license to sell liquors removes from the state, without intent to return, between the granting or awarding of the license by the court and a payment of the license fee; *held*, he is a "party licensed" within the act of April 20, 1858, Sec. 7 (P. L. 366), providing that if a "party licensed" shall die or remove, his license may be transferred by the authorities granting the same, or a license be granted to his successors for the remainder of the year. Sterrett, C. J., and Fell, J., dissenting.

MASTER AND SERVANT—CO-SERVANT—THE MIAMI, 93 F. R. 218.—Mate of vessel, after giving orders to the seamen, proceeds to assist them in carrying same out. Through negligence another seaman was injured. *Held*, that mate was acting in capacity of a co-employee and not as a vice principal, and, therefore, ship was not liable.

MUNICIPALITIES—POWER TO INCREASE INDEBTEDNESS—HOUSTON ET AL. V. CITY OF LANCASTER, 43 Atl. Rep. 83 (Penn.).—Under Const., Art. 9, Sec. 8, providing that the debt of any city shall not exceed 7 per cent. of the assessed

value of the taxable property therein, "nor shall any municipality or district incur any debt, or increase its indebtedness to an amount exceeding two per centum upon such assessed valuation of property without assent of the electors." *Held*, it does not authorize a city whose debt has not reached the 7 per cent. limit to increase it to that amount by successive additions of 2 per cent. or less; but, after the 2 per cent. has once been added, there can be no further increase by municipal authority alone, though the 7 per cent. limit may not have been reached. Mitchell, J., dissenting.

USURY—COCKRILL v. COCKRILL, 92 F. R. 811.—Where a father-in-law required, as a condition of a loan to his spendthrift son, that the latter should convey to his wife a certain tract of land, such conveyance does not constitute usury.